Comment Number	Page Number	Line, Figure, or Table No.	Commentor	Comment	
	1-	general	Jo Turner	The overall presentation of the PEIR/EIS has improved. Some of DWR's main concerns have been addressed. Given the extremely short time period for CALFED to incorporate comments for this public draft, I am reiterating some comments from ESO's Ecological Studies Branch to be addressed in the Final PEIR/EIS, along with additional comments on the public draft.	
	1 -	terminology	Ted Sommer	**Avoid the Use of the Term "Natural"** Many places in the text refer to one configuration as being more "natural" than others. The concept of naturalness is open to considerable debate in the highly modified Bay-Delta system. I recommended "closer to historical" or "better" as substitutes depending on the context. Specific recommendations are noted below.	ND
	1 -	General Alternative analyses	Ted Sommer	**The Analyses for Alternatives 2D,2E and 3H May be Inadequate** A basic assumption of the document is that creation of more aquatic and shallow-water habitat is a positive thing. Alternatives 2D, 2E and 3H include one or more of the following: · construction of a Mokelumne River Floodway and aquatic habitat in the East Delta and Tyler Island. The text periodically indicates that are superior to other alternatives for aquatic species. I am not convinced that this will create the type of high quality aquatic habitat that CALFED is hoping for. This alternative will likely result in elevated water temperatures in the Delta, creating an unfair advantage to exotic species such as competitors (carp, silverside and threadfin shad) or predators (eg largemouth bass). There is also the possibility of massive hyacinth growth, which has dubious value for native aquatic species. Specific places in the text which require qualification are noted below.	ND

	1-		Ted Sommer	**The Document May Not be Readable for the Layperson** I also question whether the EIR/S at present is readable by the general public. The text is highly distilled, perhaps overly so, requiring a thorough prior knowledge of the present system and life history of the major organisms. Despite years of experience reading EIRs and reports about the Bay-Delta, it took me an painfully long time to review each page.	ND
	2 - 1	Chap 2, Alternative descriptions	J Turner	Although the matrix showing the alternatives helps clarify the text in chapter 2, the text is confusing. For example, one alternative is described, then the next configuration is that alternative plus components, minus other components, with changes to ecosystem restoration actions. This is too confusing for a public document. At a minimum each configuration described and shown in the matrix should be accompanied by a figure showing the areas involved. Figures for each configuration are now available for view in the Project Alternatives Technical Appendix, which does help the reviewer to some extent.	ND
	2-30	1st paragraph	Spaar	Water Storage and Conveyance - The description in the 1st paragraph does not parallel the description of the 4 intakes that follows. Three isolated conveyance channels are indicated, followed by a description of each with a 4th intake (Hood) stuck in the middle of the bulleted descriptions. This makes it difficult to follow the alternative description. Suggest indicating in the 1st paragraph that the Hood intake is a 4th intake, and move it from the 3rd intake described to the 4th..	NO

H-000856

	3-1 and on	**Chapter 3**	Ted Sommer	This chapter is an acceptable accounting of all of the impacts. Unfortunately, there is no good synthesis of the combined impacts between all the sections--this should be the goal of any EIR. The document is comparable to a doctor running a series of tests and handing the patient copies of the lab reports, without an overall diagnosis. The patient is left without a clue whether they will need major surgery. At the very least, the document should lay out how the synthesis will be performed.	
	5 -3	Second paragraph after bullets	J Turner	Development of the matrices described in this paragraph included information if an impact was considered significant, but do not show the degree of significance, particularly for the different configurations within each alternative. Decision makers need to have this information in order to weigh the overall benefit/cost for each configuration.	
		Last paragraph	Spaar	Under stream restoration projects, there is no mention of the efforts on the San Joaquin tributaries to isolate instream gravel mining pits or convert the pits to floodplain or riverine areas. These are fairly substantial projects involving miles of river restoration work. Flow velocities will increase through these areas with a conversion from pond-like to riverine environment. River and floodplain dynamics will be improved to better conform with present flow regimes. See your description p. 6-107.	T NO
		3rd paragraph	Jo Turner	Should be 4-7-MAF, not 4-75-MAF	C OK
		ERP Section Column 2, 6th paragraph	Spaar	Impacts from proposed actions would be similar, but would also include impacts from the isolation of instream gravel mining pits or conversion of the pits to floodplain or riverine areas. Water temperatures are likely to decrease (improve for salmon) due to a conversion from pond-like to riverine environment (flow velocities will increase through these areas). See comment p. 6.1-51.	T NO

H—000857

		Table 6.5-1	J. Turner	Need to add Navigation under the impact issues in the Delta Region. Need to add significant and not mitigable impacts under any alternatives which include the fish control structure, and the flow control structures at Old River near Tracy and Grant Line Canal.	IA OK
		2nd paragraph	Spaar	Ecosystem Restoration - Potential restoration activities could result in short-term localized impacts of traffic routes during construction activities, such as river restoration activities planned for the San Joaquin River Region.	IA OK
		Sections 6.5.2.2 and 6.5.2.4	J Turner	In the section on transportation, almost no mention is made of impacts to navigation, except to shipping routes. In the Interim South Delta Program DEIR/EIS, there are **unavoidable, significant impacts** to transportation due to the fish control structure and two of the flow control structures. The significance criteria for that analysis has been included on page 6.5.6, bullet 3, but none of the analysis is included in the text. The document should include the information about navigation impacts due the barriers. Text on pages 16-16 and 16-17 of the ISDP EIR/EIS discusses navigation impacts. Note: the Middle River flow control structure has a less than significant impact because boat use in this area is very infrequent. Also, the other three control structures will all be equipped with boat locks to allow boat passage. I can provide a copy of the relevant text.	IA OK
		Col. 1, Para. 1.	Ted Sommer	See previous comment about Alternatives 2D,2E and 3H. I suggest deletion of the last sentence.	T NO

H-000858

		Table 7.1-1 Delta Region	J Turner	The impact issue table is sometimes inconsistent with the text. It looks like the category of impacts and the explanations were cut and pasted out of the technical appendix and makes the information here hard to follow. Examples of this are: P. 7-2, under "Through delta facilities would increase cross-Delta flow, potentially: Alternative 3H is listed as having a signif. Impact. This is confusing since this alternative has both isolated facilities and through delta facilities. Perhaps this could be corrected with a footnote explanation at the end of the table. P. 7-3, under "Construction of an intertie between the existing CVP intake and Clifton Court Forebay...In this case no discussion of this issue is found in the text. What is causing an impact from the intertie?	IA OK OK
		Tables 7.1-1 And 7.1-2	Ted Sommer	Many of the "boxes" under the "Impact Issues" heading include multiple impacts. It is unclear whether all of these points are used as the rationale for the symbol selected to represent the impacts to each alternative. For example, in Page 7-2, Row 1 lists increased entrainment loss of fish, organisms and nutrients and more net reverse flow patterns. It is unclear if more net reverse flow applies to all the alternatives--ie does the "significant, mitigatable" symbol for all the variants of Alternative 2 really include ALL of these impacts?	IA ND
		Tables 7.1-1 and 7.1-2	J Turner	These tables are a good summary of the impact issues. However, where significant adverse impacts are identified and "mitigable", there needs to be at least general types of actions listed in the text to show how the significant impacts will be mitigated.	IA ND

		Tables 7.1-1 and 7.1-2	J Turner	I don't agree with some of the designations in the tables. Some of the impacts listed as significant and mitigable are significant, but no mitigation strategies are offered to reduce their significance. Other impacts such as screened fish export facilities causing increased mortality for Sacramento fish are impacts that have been mitigated to less than significant levels by screening the facilities and being an overall benefit to fish by reducing fish losses in the central and south delta area. You need to go over these tables and include discussions of mitigation strategies to reduce significance to those that are significant under the CEQA/NEPA guidelines.	IA ND

		Table 7.1-2	J Turner	Many of the impact issues in this table are not discussed in the accompanying text. At a minimum the issues where there are adverse impacts noted in the table should be discussed in the text. I will list the issues with no text by alternative, as it was presented in the document. Alter. 1-- Construction of the barrier facilities in config. 1B and 1c would modify and destroy spawning and rearing habitat; Entrainment losses would be increased by exports from south delta and construction of barriers under config 1b and 1c Alternative 2--Aquatic productivity and food avail. In south and central delta would change in response to increased exports in the south delta; Construction of the barrier facilities in config. 2A, 2b, and 2d would modify and destroy spawning and rearing habitat; X2 may shift in summer and fall, potentially reducing habitat quality or quantity for organisms assoc. With it; Entrainment losses would be increased by exports from south delta and construction of barriers under config 2A and 2b Alternative 3--Construction of the barrier facilities in config. 3A and 3B would modify and destroy spawning and rearing habitat; X2 may shift in summer and fall, potentially reducing habitat quality or quantity for organisms assoc. With it; Change in entrainment losses attributable from an isolated facility intake on the Sacramento River [need expanded discussion of this];	IA
		SJR Region, Existing Conditions	Spaar	It would be helpful to include paragraphs 3-4, p. 6-107 of the administrative draft in the description of existing conditions. The elimination of sloughs and side channel habitat and the impact of gravel extraction on fisheries habitat (in-river gravel pits) is important in terms of the aquatic ecosystem.	T
			Ted Sommer	Substitute "historical" for "natural" in numerous places.	T